

1 CHRISTOPHER CHIOU
2 Acting United States Attorney
3 District of Nevada
4 Nevada Bar No. 14853

5 ALLISON J. CHEUNG, CSBN 244651
6 Special Assistant United States Attorney
7 160 Spear Street, Suite 800
8 San Francisco, California 94105
9 Telephone: (510) 970-4811
10 Facsimile: (415) 744-0134
11 E-Mail: allison.cheung@ssa.gov

12 Attorneys for Defendant

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

13 KIM HENSLEY,

14 Plaintiff,

15 vs.

16 ANDREW SAUL,
17 Commissioner of Social Security,

18 Defendant.

)
) Case No.: 2:21-cv-00508-VCF

)
) **UNOPPOSED MOTION FOR EXTENSION OF**
) **TIME TO FILE REPLY IN SUPPORT OF**
) **DEFENDANT'S MOTION TO DISMISS**
) **PLAINTIFF'S COMPLAINT IN PART**

) **(FIRST REQUEST)**
)
)

1 Defendant, Andrew Saul, Commissioner of Social Security (the "Commissioner"), by and through
2 his undersigned attorneys, hereby moves for a seven-day extension of time to file a reply in support of his
3 Motion to Dismiss Plaintiff's Complaint in Part (Dkt. No. 7). The reply is due to be filed by June 22,
4 2021.

5 This is Defendant's first request for an extension of time. Good cause exists for this extension due
6 to Defendant's counsel's workload as described below. Counsel currently has seven motions on her desk
7 to which she must respond. The substance of the pending motion to dismiss and Plaintiff's response raise
8 unique issues that require additional research. Counsel believes one week of additional time will be
9 sufficient, and counsel will endeavor to complete these tasks as soon as possible. This request is made in
10 good faith and with no intention to unduly delay the proceedings, and counsel apologizes for any
11 inconvenience.

12 On June 17, 2021, the undersigned conferred with Plaintiff's counsel, who has no opposition to the
13 requested extension.

14 It is therefore respectfully requested that Defendant be granted an extension of time to file the reply,
15 through and including June 29, 2021.

16
17 Dated: June 17, 2021

18 CHRISTOPHER CHIOU
Acting United States Attorney

19 /s/ Allison J. Cheung
20 ALLISON J. CHEUNG
Special Assistant United States Attorney

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22 IT IS SO ORDERED:

23 
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: 6-17-2021
26

1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My
3 business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the
4 above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR**
5 **EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF DEFENDANT'S MOTION TO**
6 **DISMISS PLAINTIFF'S COMPLAINT IN PART** on the following parties by electronically filing the
7 foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of
8 the filing:

9 Hal Taylor
10 haltaylorlawyer@gbis.com
11 Attorney for Plaintiff

12 I declare under penalty of perjury that the foregoing is true and correct.

13 Dated: June 17, 2021

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15 /s/ Allison J. Cheung
16 ALLISON J. CHEUNG
17 Special Assistant United States Attorney
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